



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 18, 2017

BY ECF AND BY EMAIL

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. William Bracy*, 15 Cr. 537 (VEC)

Dear Judge Caproni:

As the Court is aware, the parties are scheduled to appear before the Court tomorrow for a *Fatico* hearing to resolve whether defendant William Bracy struck Moises Lora a/k/a "Noah" during the gang attack on Lora on April 16, 2012 that culminated in Lora being stomped to death, and for the sentencing of Bracy for his involvement in the charged racketeering conspiracy based on his participation in the Lora murder and other crimes on behalf of the "YGz" gang. The Government respectfully submits this letter to provide the Court with additional materials that will be relevant in determining the appropriate sentence for Bracy and in assessing the credibility of the cooperating witness whom the Government will be calling at the *Fatico* hearing to testify about admissions made by Bracy establishing that during the gang attack on Lora, Bracy was one of several YGz members who kicked and hit Lora (in parts of Lora's body below his neck) while at least one other YGz member (namely, Bracy's co-defendant Wendell Belle), stomped and jumped up and down on Lora's head:

- Enclosed as Exhibit A are photographs of Lora before he was killed on April 16, 2012 in a courtyard in the Melrose housing projects in the South Bronx.
- Enclosed as Exhibit B is an article by the New York Daily News about the impact of the Lora murder on members of the community in and around the Melrose housing projects.
- Enclosed as Exhibit C are crime scene photographs of the scene of the Lora murder taken by a crime scene detective of the New York City Police Department shortly after the murder.
- Enclosed as Exhibit D are: (a) an autopsy report by the medical examiner who performed an autopsy on Lora's body containing findings by the examiner showing, among other

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things, that (i) during the fatal attack on Lora, he suffered injuries to various parts of his body (including to his head and also to parts of his body below his neck) that are consistent with him being attacked by multiple attackers, and (ii) during this attack, Lora rebroke a leg bone that had previously been broken and surgically repaired; and (b) an x-ray of Lora's leg taken in connection with his autopsy showing that leg bone reinjury.

- Enclosed as Exhibit E are three of the photographs taken of Lora's body during his autopsy.

Because of the sensitive, graphic, and revealing nature of the photographs contained in Exhibit E, the Government is providing these photographs to the Court and defense counsel for Bracy, but has not filed them publicly on the Court's electronic case file system, and the Government respectfully requests that these photographs be filed under seal.

Respectfully submitted,

JOON H. KIM

Acting United States Attorney

By: /s/

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